

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on)	
behalf of all other similarly situated,)	
)	
Plaintiff,)	Case No. 1:22-cv-06918
)	
v.)	Hon. Franklin U. Valderrama
)	
BELKIN INTERNATIONAL, INC.,)	Magistrate Judge Gabriel A. Fuentes
)	
Defendant.)	

JOINT STATUS REPORT

The parties file this status report pursuant to the Court's September 12 order (Dkt. 130).

I. Supplemental Discovery

The deposition of Norbert von Boode took place on September 25 and the 30(b)(6) deposition of Belkin took place on October 2.

The transcript of the October 2 deposition was produced by the court reporter yesterday. Gromov now intends to confer with Belkin regarding the sufficiency of the answers Belkin gave at the deposition. Gromov's view is that Belkin presented an unprepared witness and therefore failed to appear on several of the topics. Accordingly, Gromov will seek either further responses from Belkin or will file a motion to compel if the conference is unsuccessful.

Belkin is unaware of any alleged deficiencies in its 30(b)(6) testimony and disputes Gromov's characterizations. As the Court is aware, Belkin's witnesses were available for deposition for multiple months prior to the close of discovery, but Gromov elected not to go forward with the dates offered. The Court's September 12 order nonetheless permitted Gromov to complete two supplemental depositions prior to October 15, 2024 and that is what occurred.

Belkin respectfully requests that the Court not invite or permit any additional fact discovery motion practice so that the parties can move forward with the case and make timely expert disclosures.

II. Scheduling matters

The parties have stipulated to the following schedule for further deadlines in this action and would ask the Court to either enter this schedule or direct the parties to file a motion to enter it:

- Rule 26(a)(2) expert disclosures due: December 5, 2024
- Expert discovery close: January 29, 2025
- Deadline to file motion for class certification: February 17, 2025
- Opposition to motion for class certification: March 17, 2025
- Reply in support of motion for class certification: March 31, 2025
- Deadline to file motions for summary judgment and/or adjudication: 120 days after notice of the Court's ruling on class certification.

Further: Belkin's motion to dismiss has been fully briefed for about eighteen months. That motion challenged, among other things, Gromov's standing to represent purchasers of substantially similar products in the Belkin product line, as well as his standing to represent class members from states other than Illinois. The scope of Gromov's claims, therefore, is still in dispute. And because the motion is pending, Belkin has filed no answer and has tendered no affirmative defenses. A ruling on this motion would greatly inform the scope of the parties' expert disclosures.

III. Settlement discussions

The parties have nothing further to report regarding settlement.

Dated: October 17, 2024

Respectfully submitted,

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